

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION

BRUCE CHARLES, on behalf of himself  
and all other similarly situated prisoners  
at David Wade Correctional Center,

and

The ADVOCACY CENTER,

PLAINTIFFS,

VS.

JAMES M. LEBLANC, *et al.*,

DEFENDANTS.

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CIVIL ACTION NO.:

5:18-CV-00541-EEF-MLH

JUDGE ELIZABETH E. FOOTE

USMJ MARK L. HORNSBY

CLASS ACTION

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**DECLARATION OF J. DALTON COURSON**

I, J. Dalton Courson, declare, pursuant to 28 U.S.C. § 1746 and under penalty of perjury,  
based on person knowledge, as follows:

1. I am over 18 years of age and have personal knowledge of the facts set forth herein. If  
called as a witness, I could and would testify competently to them.

2. I am the Litigation Director for Disability Rights Louisiana (DRLA), formerly known as  
the Advocacy Center.

3. I have served as co-counsel with Melanie Bray since I began working at DRLA in June  
2022.

4. The billing entries attached as Exhibit A constitute a contemporaneous log of the time I  
expended in this matter. Much of my time in the last 10 months was devoted to countering the

efforts of defense counsel to stay the case, finding able special master candidates, and maintaining communication with class members.

5. Since the submission of the first fee motion (ECF No. 805) I have devoted 93.3 total hours to this matter, as detailed in Exhibit A. After the exercise of billing judgment, DRLA is requesting 67.55 hours of my time, as reflected on my timesheet. I believe that this is a reasonable request given the scope of this case and the amount of work that was needed to bring this matter to a favorable outcome for our clients. I am requesting an hourly rate of \$400.

6. My total hours have been reduced by 25.75 hours to remove administrative time or time that was duplicative or potentially excessive. The time expended and the costs incurred have been reasonable and the records submitted are an accurate reflection of my hours expended in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New Orleans, Louisiana, on June 27, 2025.

  
J. Dalton Courson

Staff	Date	Time Worked	Time Requested	Activity
D. Courson	08/16/2024	13.5	6.75	Working on revisions and preparing exhibits for motion for fees and costs and related bill of costs (12.5); reviewed 5th Circuit ruling on State's motion to stay (0.5); researching cases cited in 5th Circuit ruling (0.5).
D. Courson	08/17/2024	2.5	1.25	Finalizing memorandum in support of motion for fees and memorandum in support of bill of costs, with supporting exhibits. <i>[time reduced by 50%]</i>
D. Courson	08/19/2024	3.5	3.5	Revised and revised motion to substitute declaration (0.3); conferred with Ms. Bray regarding same (0.2); drafting motion for notice plan regarding right of class to object to fee motion under Rule 23 (3.0)
D. Courson	08/20/2024	2	2	Revising motion for notice plan regarding right of class to object to fee motion under Rule 23 (1.5); meeting with Ms. Bray regarding same (0.5)
D. Courson	08/21/2024	2.9	2.9	Reviewed defendants' reply regarding motion to stay (0.4); revising memorandum regarding motion for notice under Rule 23 and corresponding notice and conferring with Ms. Bray and Ms. Schwartzmann regarding same (2.5)
D. Courson	08/22/2024	3.8	3.8	Further revising memorandum regarding motion for notice under Rule 23 and legal research regarding same (1.5); reviewed summary of argument prepared for co-counsel for potential reply memorandum (0.3); conferring with co-counsel regarding content of notice and revising same (1.0); legal research regarding notice requirements (1.0)
D. Courson	08/23/2024	1.5	1.5	Revised memorandum in support of proposed notice to class members regarding fee issue
D. Courson	08/24/2024	0.4	0	<del>Revised memorandum in support of Rule 23(h) notice motion</del>
D. Courson	08/26/2024	1	0	Revising memorandum support of motion regarding notice to class of fee motion (0.2); drafted accompanying motion (0.2); reviewed revisions from Ms. Schwartzmann (0.1); reviewed email from Keogh Cox firm regarding motion and request for extension and discussed same with Ms. Bray (0.2); reviewed further email regarding extension (0.2); responded to inquiry from potential monitor Pablo Stewart (0.1)
D. Courson	08/27/2024	2.8	0	<del>Edited response to opposing counsel regarding their request for an extension (0.6); conferred with Ms. Bray regarding call with reporter (0.2); assisting with preparation of binders for the court regarding motion for fees (1.5); taking same to FedEx to ship to the Court (0.5); reviewed state's motion to stay fee motion (0.3)</del>
D. Courson	08/29/2024	0.4	0.2	Conferred with Ms. Bray regarding calls with David Wade prisoners (0.2); conferred regarding opposition to motion to stay fee motion (0.2). <i>[time reduced by 50%]</i>
D. Courson	09/03/2024	0.4	0	Email to opposing counsel requesting calls with class members (0.2); reviewing court orders suspending deadlines and granting motion to substitute exhibit, motion for leave to file excess pages (0.2)
D. Courson	09/04/2024	0.1	0	Email to opposing counsel to schedule phone calls with class members (follow-up)
D. Courson	09/05/2024	2.5	2.5	Calls with inmates (2.2); follow-up conversation with Ms. Bray afterwards (0.3)
D. Courson	09/06/2024	0.2	0	<del>Reviewed court order denying motion to stay plaintiffs' motion for attorney fees</del>
D. Courson	09/09/2024	1.6	1.6	Legal research regarding substitution of class reps (1.2); email with counsel regarding same (0.4)
D. Courson	09/13/2024	1.4	1.4	Drafted memo regarding recent calls with DWCC inmates (1.0); reviewed email from opposing counsel regarding discovery request (0.1); conferred with Ms. Bray and Mr. Cobbs regarding same (0.3)
D. Courson	09/16/2024	1.5	1.5	Legal research regarding availability of discovery on fee motions (0.4); drafted letter to opposing counsel replying to their request for discovery (0.9); emailed draft to co-counsel with explanation (0.2)
D. Courson	09/17/2024	0.5	0.25	Conferred with Ms. Bray regarding status of judge's rulings on pending motions (0.3); revised letter to opposing counsel on fee motion in response to comments from co-counsel (0.2). <i>[time reduced by 50%]</i>
D. Courson	09/20/2024	1.5	0.75	Review and analysis of court's ruling denying motion for additional facts <i>[time reduced by 50%]</i>
D. Courson	09/23/2024	0.2	0	<del>Email to Pablo Stewart regarding status of selection of monitors</del>
D. Courson	09/25/2024	0.2	0	<del>Call with Ms. Bray regarding responding to emails from opposing counsel about our position on motions relative to a stay</del>
D. Courson	09/26/2024	0.2	0	<del>Reviewed Judge Foote's order staying the fee motion (0.1); email to co-counsel regarding same (0.2)</del>
D. Courson	10/01/2024	0.2	0.2	Email with Ms. Birk regarding calls to DWCC
D. Courson	10/03/2024	1.4	1.4	Prepared for and conducted inmate calls (1.0); conferred with Ms. Bray regarding same, including issue of retaliation (0.4)
D. Courson	10/16/2024	0.1	0	<del>Email with Ms. Birk regarding incoming letters</del>
D. Courson	10/25/2024	0.1	0	<del>Email from Ms. Bray regarding update on Parker appeal</del>
D. Courson	10/31/2024	1.3	1.3	Participated in calls with class members
D. Courson	11/01/2024	0.2	0	<del>Responded to Martin Horn regarding status of the case, in response to his inquiry</del>
D. Courson	11/10/2024	0.1	0	<del>Email with prospective monitor Pablo Stewart regarding case status</del>
D. Courson	11/27/2024	0.1	0	<del>Reviewed news posting about medical care at DWCC</del>
D. Courson	12/10/2024	0.2	0	<del>Email exchange with Ms. Birk regarding DWCC calls; email to Keith Fernandez to request same</del>
D. Courson	12/12/2024	0.2	0	<del>Email with co-counsel regarding repetitive filing in appellate court</del>
D. Courson	12/13/2024	0.2	0	<del>Reviewed motion to stay appeal</del>
D. Courson	12/15/2024	2	2	Drafted opposition to motion to stay appeal
D. Courson	12/16/2024	0.1	0	<del>Email with co-counsel regarding opposition to motion to stay</del>
D. Courson	12/18/2024	0.4	0.4	Reviewed district court's order for a status conference (0.1); conferred with co-counsel regarding same via email (0.3)
D. Courson	12/19/2024	0.4	0	<del>Received email from opposing counsel regarding request for extension of briefing deadline; conferred with co-counsel regarding same via email</del>
D. Courson	12/20/2024	1.2	0	<del>Reviewed state's reply in support of their motion to stay appeal and conferred with co-counsel regarding same (0.6); reviewed state's motion for extension of time (0.2); reviewed draft update letter to clients (0.2)</del>
D. Courson	12/20/2024	0.8	0.8	Call with DWCC inmates
D. Courson	12/23/2024	3.4	3.4	Conferred with Ms. Bray regarding potential sur-reply regarding motion to stay appeal (0.4); drafting sur-reply (2.8); reviewed motion to enroll Brungard (0.1); reviewed order granting extension of briefing schedule (0.1)
D. Courson	12/24/2024	0.9	0.9	Email correspondence regarding proposed sur-reply (0.2); conferred with Ms. Birk regarding same (0.1); legal research regarding sur-replies to a motion in federal appeals courts (0.5); reviewed response from appellee counsel (0.1)
D. Courson	12/27/2024	0.1	0	<del>Reviewed order granting stay of appeal</del>
D. Courson	01/06/2025	0.5	0.5	Legal research regarding jurisdictional issues in preparation for status conference with the court

Staff	Date	Time Worked	Time Requested	Activity
D. Courson	01/09/2025	0.2	0	Email correspondence with co-counsel to prepare for upcoming status conference
D. Courson	01/13/2025	0.9	0.9	Performing legal research regarding jurisdictional issues in preparation for status conference
D. Courson	01/14/2025	5	5	Preparing for status conference with Judge Foote (reviewing pleadings and motions) (1.5); meeting with co-counsel to prepare for same (0.5); performing legal research on the jurisdictional issues raised by the court (3.0)
D. Courson	01/15/2025	2.5	2.5	Prepared for and participated in status conference with Judge Foote
D. Courson	01/23/2025	0.2	0	Reviewed request from Charles H. Parker
D. Courson	01/28/2025	1.5	1.5	Reviewed and edited letter to the court
D. Courson	01/31/2025	0.2	0	Responded to Pablo Stewart with update
D. Courson	02/12/2025	0.5	0	Reviewing the Fifth Circuit's ruling in Parker case; conferred with Ms. Bray regarding same; email to co-counsel regarding same
D. Courson	02/13/2025	0.3	0	Research 5th Circuit local rules regarding issuance of mandate in cases where court finds that there is a lack of jurisdiction
D. Courson	03/10/2025	0.5	0.5	Conferring with Ms. Bray regarding plans for upcoming visit to David Wade, regarding information received regarding witness from first trial, and communications with court regarding order on case caption (0.4); reviewed court order re caption (0.1)
D. Courson	03/19/2025	0.1	0	Conferred with Ms. Bray regarding upcoming visit to David Wade
D. Courson	03/27/2025	0.2	0	Reviewed notice from the court re-setting the status conference (0.1); conferred with Ms. Bray regarding her calls with class members (0.1)
D. Courson	03/31/2025	0.1	0	Reviewed motion to enroll by opposing counsel
D. Courson	04/23/2025	1	0	Prepared for and attended status conference with Judge Foote
D. Courson	04/23/2025	1.5	1.5	Prepared for and participated in status conference with court (1.0); conferred with Ms. Bray regarding same (0.3); reviewed Fifth Circuit order granting rehearing in Parker case (0.2)
D. Courson	05/09/2025	1	0	Meeting with Ms. Bray and Ms. Birk to discuss strategy for preparing scheduling order and other tasks
D. Courson	05/12/2025	0.6	0	Participating in meeting with potential co-counsel regarding attorney fees
D. Courson	05/19/2025	0.8	0.8	Call with co-counsel to discuss proposed scheduling order (0.6); edited draft email to experts (0.2)
D. Courson	05/20/2025	1.7	0	Discussion with co-counsel regarding preparing for litigation regarding fee motion (0.8); reviewed information regarding potential counsel (0.5); call with potential counsel (0.4)
D. Courson	05/22/2025	0.6	0.6	Call with John Adcock regarding representation on fee motion (0.2); sending emails to potential special masters/monitors (0.2); call with Dr. Pablo Stewart (0.2)
D. Courson	05/23/2025	0.2	0	Responded to email from John Adcock (0.1); sent email to proposed special master/monitor (0.1)
D. Courson	05/27/2025	0.3	0	Reviewed district court order setting deadline for opposition (0.2); call with Ms. Bray regarding same and regarding response to Mr. Adcock (0.1)
D. Courson	05/28/2025	1.2	1.2	Reviewed defendants' Fifth Circuit letter submission (0.2); drafted response to same (1.0)
D. Courson	05/29/2025	5.5	5.5	Drafting memorandum in opposition to renewed motion to stay, including legal research for same and revising same (5.0); revised response to Defendants' fifth circuit letter (0.5)
D. Courson	05/30/2025	2.1	2.1	Revised memorandum in opposition to renewed motion to stay (2.0); reviewed engagement letter from Mr. Adcock (0.1)
D. Courson	06/03/2025	0.2	0	Reviewed engagement letter for John Adcock
D. Courson	06/04/2025	0.2	0	Edited proposed scheduling order
D. Courson	06/05/2025	0.5	0.25	Edited proposed schedule [time reduced by 50%]
D. Courson	06/06/2025	2.2	2.2	Editing proposed scheduling order and language therein (0.5); reviewed district court order denying stay motion (0.2); drafted and revised memorandum in support of motion for site visit (1.5)
D. Courson	06/09/2025	1	1	Conferred with Ms. Bray regarding response to Keith Fernandez regarding motion for site visit (0.4); edited draft response to opposing counsel (0.5) conferred regarding revisions to motion (0.1)
D. Courson	06/12/2025	0.2	0.2	Reviewed order setting briefing on motion for visit to DWCC (0.1); email regarding expert for fee motion (0.1)
D. Courson	06/13/2025	0.3	0.3	Reviewed response from opposing counsel regarding fee motion (0.1); edited draft response to same for Ms. Bray (0.1); email with Mr. Adcock regarding fee motion (0.1)
D. Courson	06/16/2025	0.3	0	Call with John Adcock regarding fee motion
D. Courson	06/20/2025	1	0.5	Reviewing timesheet for write-downs [time reduced by 50%]
D. Courson	06/24/2025	0.2	0.2	Reviewing emails and documents relating to supplement to fee motion
		93.3	67.55	TOTAL